

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

CASE NO.: 1:23-cv-22322-KMW

BETTY'S BEST, INC.,

Plaintiff,

v.

THE INDIVIDUALS, PARTNERSHIPS
AND UNINCORPORATED
ASSOCIATIONS IDENTIFIED ON
SCHEDULE "A",

Defendants.

STIPULATION FOR HEARING ON PRELIMINARY INJUNCTION

The parties hereby stipulate to the following statements of fact *solely* for purposes of plaintiff's motion for preliminary injunction and the preliminary injunction hearing set for November 13, 2023 and not for purposes of liability or any other purposes.

1. The trademark STRIPHAIR was registered on November 1, 2016 with the United States Patent and Trademark Office, Reg. No. 5,072,866 in class 021 for "Grooming tools for pets, namely, combs and brushes".

2. Plaintiff filed a Section 15 declaration with the United States Patent and Trademark Office that was accepted on September 24, 2022 for "Grooming tools for pets, namely, combs and brushes."

3. The trademark THE GENTLE GROOMER was registered on November 7, 2017, with the United States Patent and Trademark Office, Reg. No. 5,328,641 in class 021.

4. Plaintiff filed a Section 15 declaration with the United States Patent and Trademark Office that was accepted on July 14, 2023 for "Grooming tools for pets, namely, combs and brushes."

5. On June 22, 2022 Plaintiff registered a copyright for the group of photographs published on December 1, 2021 entitled "StripHair Product Pictures 2021" and was issued registration number VA 2-304-931.

6. Plaintiff registered the copyright for the work "SH-Video-1 11.01.2019" on June 14, 2022, and was issued registration number PAu 4-142-655.

7. Plaintiff registered the copyright for the work "SH-Video-2 4.01.2021" on June 14, 2022, and was issued registration number PAu 4-142-666.

8. Plaintiff registered the copyright for the work "SH-Video-3 7.01.2021" on June 30, 2022, and was issued registration number PAu 4-143-928.

9. Plaintiff registered the copyright for the work "SH-Video-4 4.01.2018" on June 30, 2022, and was issued registration number PAu 4-143-929.

10. Plaintiff registered the copyright for the work "SH-Video-5 3.01.2019" on July 14, 2022, 2022 and was issued registration number PAu 4-145-045.

11. Plaintiff registered the copyright for the work "SH-Video-7 6.01.2020" on July 19, 2022, and was issued registration number PAu 4-145-360.

12. Plaintiff registered the copyright for the work "SH-Video-8 5.01.2021" on July 19, 2021, and was issued registration number PAu 4-145-361.

13. Plaintiff registered the copyright for the work "SH-Video-6 2.01.2019" on July 19, 2022, and was issued registration number PAu 4-145-379.

14. On October 6, 2021 Plaintiff registered the copyright for the work “striphair.com website” published on January 20, 2021 and was issued registration number VA 2-271-013.

15. On February 26, 2019 the USPTO issued U.S. Patent No. D841,900 entitled “HORSE OR PET GROOMING TOOL.”

Respectfully submitted,

Dated: November 13, 2023

/s/ Angela M. Nieves

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785, 702, 914, 927, 786, 817, 825, 871, 798,
877, 840, 915, 772, 880, 917, 923, 713, 839,
715, 728, 765, 803, 909, 879, 780, 818, 819,
878, 883, 822, 910, 858, 888, 922, 891, 904.